

YOUNG CONAWAY STARGATT & TAYLOR, LLP

BARRY M. WILLOUGHBY
DIRECT DIAL: (302) 571-6666
DIRECT FAX: (302) 576-3345
bwilloughby@ycst.com

THE BRANDYWINE BUILDING
1000 WEST STREET, 17TH FLOOR
WILMINGTON, DELAWARE 19801

P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

(302) 571-6600
(302) 571-1253 FAX
(800) 253-2234 (DE ONLY)
www.youngconaway.com

September 16, 2005

VIA E-FILING and HAND DELIVERY

The Honorable Joseph J. Farnan, Jr.
United States District Court
844 King Street
Lock Box 27
Wilmington, DE 19801


Re: Crowell v. Pace International Union,
AFL-CIO CLC Local 2-0770 - C.A. No. 04-259

Dear Judge Farnan:

I am writing to update the Court on the status of the above-referenced matter. As your Honor is aware, the Union has filed a motion for relief from the Court's judgment in this matter. The Employer opposes that request.

An arbitration concerning whether or not the Grievant, Robert Blisard, is entitled to the remedies that the Union has requested in its motion is now scheduled for November 22, before Arbitrator, Seymour Strongin, Sr. In light of the scheduling of the arbitration, the Employer believes the motion is moot.

Respectfully,



Barry M. Willoughby

BMW:mmcm

cc: Clerk, U.S. District Court
Joseph Rhoades, Jr., Esquire
Thomas Kohn, Esquire